

## REMARKS

In the Office Action, claims 1-14, 16, and 23-42 were rejected, claims 17-22 were withdrawn from consideration, and claim 15 was objected to by the Examiner. Applicants thank the Examiner for indicating the allowability of claim 15. Claim 15 has been placed into independent form including all limitations of base claim 1. Accordingly, claim 15 should be in condition allowance.

By this Reply and Amendment, claims 1, 5, 6, 15, 28, 34, 35 and 44 have been amended, claims 3, 4, 17-22 and 33 have been canceled without prejudice, and claims 1, 2, 5-16, 23-32 and 34-46 remain pending for consideration by the Examiner. All claim amendments are fully supported throughout the written description and figures of the specification.

In the Office Action, the claims were restricted to either Group I (claims 1-16 and 23-44) or Group II (claims 17-22). The provisional election made on July 27, 2006 to prosecute claims 1-16 and 23-44 is hereby affirmed. Claims 17-22 have been canceled without prejudice.

Claims 1-3, 8, 10-13, 16, 28-31 and 42-45 were rejected under 35 USC 102(e) as anticipated by the Patel et al. reference, US Patent Publication No.: 2003/0221829. This rejection is respectfully traversed; however independent claims 1, 28 and 44 have been amended to clarify the claim language.

The Patel et al. reference discloses a well system 200 having a control line system 201. The well system 200 is deployed into a wellbore and includes a lower completion 202, an upper completion 204 and a stinger or dip tube 206. The upper completion 204 comprises a packer 212 and a side pocket sub 214 which may have a connection feature 216. Connection feature 216 can be engaged with a corresponding connection feature 222 to form a wet connect by which a lower control line 226 within dip tube 206 is coupled with an upper control line 228. (See paragraphs 0096-0100). However, connection feature 216 does not comprise an orienting mechanism to orient a control line within a deviated wellbore, as suggested in the Office Action. (See Office Action, pages 4 and 7).

The Patel et al. reference also discloses a sand screen 28 having a shroud 74 and control lines 60 routed therethrough. The reference discloses a variety of potential passageways in the sand screen 28 and shroud 74 that can be used for routing control lines 60. (See paragraphs 0059-0060). However, the reference does not disclose and provides no suggestion or motivation for placement of a control line in a recess formed in a wall of a stinger or in an encapsulation along a stinger. Accordingly, the Patel et al. reference does not disclose various elements of the pending, independent claims. The reference also fails to support a prima facie case of obviousness with respect to the pending, independent claims because it does not provide the requisite disclosure of elements and/or the requisite suggestion or motivation for the combination of other elements.

With respect to the rejection under 35 USC 102(e), the Patel et al. reference fails to disclose numerous claim elements. For example, the reference fails to disclose an upper completion having a stinger for insertion into a lower completion and a control line, wherein the stinger "comprises a protection mechanism for the control line, the protection mechanism comprising a recess formed in a wall of the stinger" as recited in amended, independent claim 1. Similarly, the reference fails to disclose moving production tubing and an upper completion simultaneously into a wellbore until the upper completion engages a lower completion such that a stinger extends into the lower completion with a control line located "within a recess formed in a wall of the stinger" as recited in amended, independent claim 28. The reference further fails to disclose means for routing a control line along the exterior of a stinger wherein the means "comprises an encapsulation in which the control line is encapsulated" as recited in amended, independent claim 44.

Claims 2, 8, 10-13, 16, 29-31, 42-43 and 45 ultimately dependent from one of the independent claims discussed above. Accordingly, the reference fails to support the rejection of these dependent claims for the reasons provided above with respect to the corresponding independent claims, and because of the unique subject matter recited in these dependent claims.

Claims 4-7, 9, 14, 23-27, 32-41 and 46 were rejected under 35 USC 103(a) as obvious over the Patel et al. reference. This rejection is respectfully traversed.

Of the remaining claims, claims 5-7, 9 and 14 directly depend from amended, independent claim 1; claims 32 and 34-41 ultimately depend from independent claim 28; and claim 46 directly depends from amended, independent claim 44. Each of these dependent claims is patentably distinguishable over the Patel et al. reference for the reasons provided above with respect to the corresponding independent claims 1, 28 and 44, as well as for the additional unique subject matter recited in these dependent claims. The Patel et al. reference provides no additional suggestion or motivation that would obviate the disclosure deficiencies discussed above with respect to the independent claims.

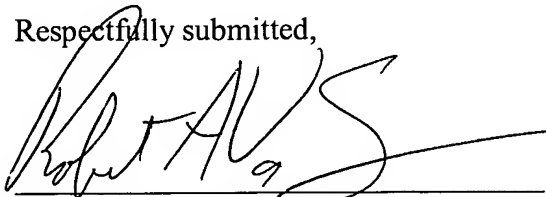
In rejecting independent claim 23, the Patel et al. reference is relied on as disclosing that "mechanism 216 orients the control line toward a bottom of the well" whether the well is deviated or straight. (See Office Action, page 7). As described above, however, reference numeral 216 is used to label a "connection feature 216" such as a wet connect. The connection feature 216 does not comprise or suggest "an orienting mechanism to orient the control line within the deviated wellbore" as recited in independent claim 23. Accordingly, the Patel et al. reference is not sufficient to establish a prima facie case of obviousness, and the rejection should be withdrawn.

Claims 24-27 directly depend from independent claim 23. Accordingly, the Patel et al. reference also fails to support the rejection of these dependent claims for the reasons provided above with respect to independent claim 23. Furthermore, each of these dependent claims recites unique, additional elements.

In view of the foregoing remarks, the pending claims are believed patentable over the cited references. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Date: November 2, 2006

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert A. Van Someren', written over a horizontal line.

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